

*United States Attorney
Southern District of New York*

March 8, 2024

BY ECF

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Qingzhou Wang and Yiyi Chen*, 23 Cr. 302 (PGG)

Dear Judge Gardephe:

Yesterday, with the consent of the Government, defendants Qingzhou Wang and Yiyi Chen moved to adjourn the status conference presently scheduled for March 11, 2024 to April 8, 2024. (Dkt. 51). The basis for the request was the Government's recent production of additional discovery, which consists of Mandarin-language communications from Chen's phones that the Government has preliminarily determined to be responsive to the search warrant.¹ (*See* Dkt. 49 (explaining that "[o]ver the winter holidays and as recently as yesterday, the Government gained access to two cellphones belonging to defendant Yiyi Chen.")). Should the Court adjourn the conference, the Government respectfully moves to exclude Speedy Trial time until the next conference date so that the parties may review the discovery, with the assistance of translators as needed, and so that the defense may consider any pretrial motions. As indicated in their letter filed today, (Dkt. 52), counsel for both defendants consent to the exclusion of time to April 8, 2024.

Respectfully submitted,

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cc: All counsel of record (*by ECF*)

¹ The Government is continuing to review the Mandarin-language devices and will produce additional responsive data on a rolling basis.